### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

UNITED STATES OF AMERICA,	§	
Plaintiff	§	
	§	
vs.	§	<b>CASE NO. 4:14-CR-28</b>
	§	
RENE TAMEZ (21),	§	
Defendant.	§	

# UNOPPOSED MOTION FOR CONTINUANCE OF PRETRIAL DEADLINES

#### TO THE HONORABLE JUDGE OF SAID COURT:

**NOW COMES** the Defendant, RENE TAMEZ, by and through his attorney of record, and files this his Unopposed Motion for Continuance of Pretrial Deadlines in the above styled and numbered cause, and in support thereof would show the Court the following:

I.

The above referenced styled case is set for a Pretrial on Monday, July 7th, 2014 at 9:00 a.m.

II.

Mr. Heath Hyde, Attorney of Record, is number 1 on the Jury Trial Docket on Texas vs. Charles Miller in the 8th Judicial District Court of Hopkins County, Texas, Judge Eddie Northcutt presiding, and will be selecting a jury on said date and time. This is a newly acquired case, and more time is needed to review discovery and discuss possible options with Defendant. Assistant United States Attorney, Ernest Gonzalez, is unopposed to the filing of this motion. We would ask for a 60 day continuance at this time as Mr. Hyde will be on a scheduled family vacation during the early part of August, 2014.

#### III.

This motion is made for the interest of justice and not for the purpose of delay.

WHEREFORE PREMISES CONSIDERED, the Defendant prays this Honorable Court grant his Unopposed Motion for Continuance of Pretrial Conference and continue this matter for 60 days.

Respectfully submitted,

/s/ Heath Hyde

#### **HEATH HYDE**

Heath Hyde, Attorney at Law State Bar Card No. 00796807 2515 McKinney Avenue, Suite 1400 Dallas, Texas 75201 (214) 237-0848 Phone (214) 237-0901 Fax Attorney for DEFENDANT

# **CERTIFICATE OF CONFERENCE**

I, Heath Hyde, counsel for the Defendant, certify that I conferred with Assistant United States Attorney, Ernest Gonzalez, on July 1<sup>st</sup>, 2014, and he is unopposed to the filing of this motion.

/s/ Heath Hyde

#### **HEATH HYDE**

## **CERTIFICATE OF SERVICE**

I, Heath Hyde, counsel for the defendant, certify that a copy of the foregoing was delivered to Assistant United States Attorney, Ernest Gonzalez, by the CM/ECF System.

/s/ Heath Hyde

**HEATH HYDE**